

REMARKS

Reconsideration and allowance of this application are respectfully requested in light of the above amendments and the following remarks.

Claims 9 and 12 have been amended to overcome the rejections under 35 USC 112, second paragraph, applied to claims 9-14.

Claims 9-14 stand rejected, under 35 USC § 103(a), as being unpatentable over Venkitaraman (US 2003/0185196) in view of Karoubalis (US 2005/0018637) and Vivaldi ("Fast Handover Algorithm for Hierarchical Mobile IPv6 Macro-Mobility Management" article). The Applicant respectfully traverses these rejections based on the points set forth below.

Claim 9 defines a communication system having a home agent that stores first and second care-of addresses, issued by a mobility anchor point, of a communication terminal apparatus and forwards data directed to a home address of the communication terminal apparatus to a destination indicated by the first and second care-of addresses, the latter care-of address being effective in adjacent cells across a boundary of two mobility anchor points. By forwarding data directed to a home address of a communication terminal apparatus to a destination indicated by both: (1) a second care-of address, which is effective in adjacent cells across a boundary of two mobility anchor points, and (2) a first care-of address, the claimed subject matter supports reducing the work load for a network managing the communication terminal apparatus at the boundary of two mobility anchor points and reducing the communication delay of forwarding packets to the communication terminal as it transitions from one mobility anchor point to another (see specification page 6, line 23, through page 7, line 2). (References herein to the specification

and drawings are for illustrative purposes only and are not intended to limit the scope of the invention to the referenced embodiments.)

The Office Action acknowledges that Venkitaraman does not disclose the Applicant's claimed subject matter of a care-of address that is effective in adjacent cells across a boundary of two mobility anchor points (see Office Action page 4, second to last paragraph). To overcome this deficiency, the Office Action proposes that Karoubalis discloses ensuring a constant IP address after a handover and Vivaldi discloses care-of addresses that are effective in adjacent cells (see page 5, first and last paragraphs).

However, Karoubalis discloses maintaining substantially constant IP-connectivity during a handover operation (see Karoubalis paragraph [0007], last sentence). Karoubalis does not disclose ensuring a constant IP address after a handover, as proposed in the Office Action. Maintaining constant IP-connectivity and maintaining a constant IP address are not the same.

Vivaldi does not disclose a care-of address that is effective in adjacent cells of first and second mobility anchor points (MAPs). Instead, Vivaldi discloses that a mobile node acquires a new regional care-of address (RCoA) and a new local care-of address (LCoA) whenever the mobile node moves from one MAP to another (see Vivaldi page 631, last paragraph of left column).

Accordingly, the Applicant submits that the teachings of Venkitaraman, Karoubalis and Vivaldi, considered individually or in combination, do not render obvious the subject matter defined by claim 9. More specifically, the applied references do not disclose the Applicant's claimed subject matter of a care-of address that is effective in adjacent cells across a boundary of two mobility anchor points. Independent claim 12 similarly recites the above-mentioned subject

matter distinguishing apparatus claim 9 from the applied references, but with respect to a method. Therefore, allowance of claims 9 and 12 and all claims dependent therefrom is warranted.

To promote a better understanding of the patentable distinctions of the Applicant's claimed subject matter over the applied references, the Applicant submits the following additional remarks.

The Office Action does not propose that Venkitaraman and Karoubalis disclose the Applicant's claimed subject matter of a home agent that stores first and second care-of addresses, issued by a mobility anchor point, of a communication terminal apparatus. Instead, the Office Action proposes that Vivaldi discloses issuing, to a mobile node, two care-of addresses that are effective in adjacent cells (see Office Action page 5, last paragraph).

However, Vivaldi does not disclose the Applicant's claimed subject matter of issuing two care-of addresses of a first care-of address and a second care-of address as care-of addresses to be stored in a home agent. That is, Vivaldi discloses simply issuing two care-of addresses of a regional-care-of-address (RCoA) and an on-link-care-of-address (LCoA), but does not disclose issuing two regional-care-of-addresses (RCoA). Here, the on-link-care-of-address (LCoA) is not a care-of address to be stored in a home agent (see paragraph [0008] of Applicant's specification).

In view of the above, it is submitted that this application is in condition for allowance and a notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,

/James Edward Ledbetter/

Date: March 9, 2009
JEL/DWW/att

James E. Ledbetter
Registration No. 28,732

Attorney Docket No. 009289-05155
Dickinson Wright PLLC
1875 Eye Street, NW, Suite 1200
Washington, DC 20006
Telephone: (202) 659-6966
Facsimile: (202) 659-1559